

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

NEIMAN MARCUS GROUP LTD LLC, *et al.*,<sup>1</sup>

Reorganized Debtors.

)

)

) Chapter 11

)

) Case No. 20-32519 (DRJ)

)

) (Jointly Administered)

)

**CERTIFICATE OF NO OBJECTION  
TO LIQUIDATING TRUSTEE'S SEVENTEENTH  
OMNIBUS OBJECTION TO CLAIMS (NO SUPPORTING DOCUMENTS CLAIMS)**

[Related Docket No. 2490]

The undersigned hereby certifies as follows:

1. On May 21, 2021, the *Liquidating Trustee's Seventeenth Omnibus Objection to Claims (No Supporting Documents Claims)* [Docket No. 2490] (the "Objection") was filed with the Court by the trustee for the Liquidating GUC Trust (the "Liquidating Trustee").

2. Responses, if any, to the Objection were required to have been filed with the Court on or before June 21, 2021 (the "Response Deadline").

3. The Response Deadline has passed and no responsive pleading to the Objection has appeared on the Court's docket in the above-captioned chapter 11 cases or were served upon

---

<sup>1</sup> The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Reorganized Debtor's federal tax identification number, are: Neiman Marcus Group LTD LLC (9435); Bergdorf Goodman Inc. (5530); Bergdorf Graphics, Inc. (9271); BG Productions, Inc. (3650); Mariposa Borrower, Inc. (9015); Mariposa Intermediate Holdings LLC (5829); NEMA Beverage Corporation (3412); NEMA Beverage Holding Corporation (9264); NEMA Beverage Parent Corporation (9262); NM Bermuda, LLC (2943); NM Financial Services, Inc. (2446); NM Nevada Trust (3700); NMG California Salon LLC (9242); NMG Florida Salon LLC (9269); NMG Global Mobility, Inc. (0664); NMG Notes PropCo LLC (1102); NMG Salon Holdings LLC (5236); NMG Salons LLC (1570); NMG Term Loan PropCo LLC (0786); NMG Texas Salon LLC (0318); NMGP, LLC (1558); The Neiman Marcus Group LLC (9509); The NMG Subsidiary LLC (6074); and Worth Avenue Leasing Company (5996). The Reorganized Debtors' service address is: One Marcus Square, 1618 Main Street, Dallas, Texas 75201.

the undersigned counsel with respect to the claims listed on **Schedule 1** to **Exhibit A**. Further, the Liquidating Trustee has withdrawn the Objection without prejudice as it relates to the claims listed on **Schedule 2** to **Exhibit A**. Accordingly, the undersigned respectfully requests that the form of Order granting the Objection attached hereto as **Exhibit A** be entered at the earliest convenience of the Court.

Dated: June 28, 2021

/s/ Michael D. Warner

---

Michael D. Warner (TX Bar No. 00792304)  
Benjamin L. Wallen (TX Bar No. 24102623)  
**PACHULSKI STANG ZIEHL & JONES LLP**  
440 Louisiana Street, Suite 900  
Houston, TX 77002  
Telephone: (713) 691-9385  
Facsimile: (713) 691-9407  
Email: mwarner@pszjlaw.com  
bwallen@pszjlaw.com

-and-

Justin Bernbrock (admitted *pro hac vice*)  
Bryan Uelk (admitted *pro hac vice*)  
Robert B. McLellarn (admitted *pro hac vice*)  
**SHEPPARD, MULLIN, RICHTER & HAMPTON LLP**  
70 West Madison Street, 48th Floor  
Chicago, Illinois 60602  
Telephone: (312) 499-6300  
Facsimile: (312) 499-6301  
Email: jbernbrock@sheppardmullin.com  
buelk@sheppardmullin.com  
rmcllellarn@sheppardmullin.com

-and-

Jennifer Nassiri (admitted *pro hac vice*)  
**SHEPPARD, MULLIN, RICHTER & HAMPTON LLP**  
333 South Hope Street, 43rd Floor  
Los Angeles, CA 90071  
Telephone: (213) 617-4106  
Facsimile: (213) 443-2739  
Email: jnassiri@sheppardmullin.com

-and-

Amanda Cottrell, Esq. (TX Bar No. 24064972)  
Steven Gersten, Esq. (TX Bar No. 24087579)  
**SHEPPARD, MULLIN, RICHTER & HAMPTON LLP**  
2200 Ross Avenue, 24th Floor  
Dallas, TX 75201  
Telephone: (469) 391-7400  
Facsimile: (469) 391-7577  
Email: acottrell@sheppardmullin.com

*Counsel for the Liquidating GUC Trust and Mohsin Meghji,  
in his capacity as trustee of the Liquidating GUC Trust*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 28th day of June, 2021, a true and correct copy of the above and foregoing has been served by electronic transmission to all registered CM/ECF users appearing in these cases.

/s/ Michael D. Warner

Michael D. Warner